

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

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| <p>IN RE:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al., THE EMPLOYEES' RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY</p> <p style="text-align: center;">Debtors</p> | <p>PROMESA TITLE III Case No. 17-BK-3283 (LTS)</p> |
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**SUCN. DE FRANK TORRES ORTIZ & AUREA RODRIGUEZ
COMPOSED BY FRANK E. TORRES RODRIGUEZ & EVA TORRES
RODRÍGUEZ'S MOTION FOR JOINDER TO SUCESIÓN PASTOR
MANDRY MERCADO'S, EXCEPTING JAVIER MANDRY MERCADO,
OBJECTION TO "SEVENTH AMENDED TITLE III JOINT PLAN OF
ADJUSTMENT OF THE COMMONWEALTH OF PUERTO RICO, ET. AL.
FILED AT DOCKET NUMBER 17998**

TO THE HONORABLE COURT:

**COMES NOW, SUCN. DE FRANK TORRES ORTIZ & AUREA RODRIGUEZ
COMPOSED BY FRANK E. TORRES RODRIGUEZ & EVA TORRES RODRIGUEZ,
("TORRES"), through the undersigned counsel to hereby submit this Joinder (this
"Joinder") to the Objection to the Seventh Amended Title III Joint Plan of Adjustment
of The Commonwealth of Puerto Rico, Et. Al, filed by Sucesión Pastor Mandry**

Mercado, excepting Javier Mandry Mercado, filed at Docket No. 17998.

1. **TORRES** is a creditor in the Commonwealth Title III case. On May 29, 2018, **TORRES** filed Proof of Claim No. 29499 in the amount of \$20,000,000.00 as a taking of property and/or inverse condemnation claim protected under the Takings Clause under the Constitution of the United States and the Constitution of the Commonwealth of Puerto Rico.

2. **TORRES** joins the legal grounds and arguments discussed in the Objection filed by Sucesión Pastor Mandry Mercado filed at Docket No. 17998, as well as the relief requested therein.

3. **TORRES** joins the Objection and contends the confirmation of the Seventh Plan of Readjustment should be denied because the plan fails to correctly classify the eminent domain and inverse condemnation creditors; fails to recognize these claims as nondischargeable and forsakes the requirements under the Fifth Amendment of the Constitution of the United States.

4. **TORRES** reserves its right to raise additional arguments in support of the Objection to Confirmation.

WHEREFORE, Sucn. De Frank Torres Ortiz & Aurea Rodriguez Composed by Frank E. Torres Rodriguez & Eva Torres Rodríguez respectfully requests that the Court GRANT this Joinder and deny the confirmation of the Seventh Plan of Readjustment proposed by the Commonwealth under Title III of PROMESA.

CERTIFICATE OF SERVICE

I hereby certify that, on October 19, 2021, I caused the preceding document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants in this case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19th day of October 2021.

**COUNSEL FOR Sucn. De Frank Torres Ortiz &
Aurea Rodriguez Composed by Frank E. Torres
Rodriguez & Eva Torres Rodríguez**

s/ Alexis Fuentes-Hernández, Esq.

**Alexis Fuentes-Hernández, Esq.
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